



**Comtec Information Systems, Inc.**

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June 5, 1993

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Federal Communications Commission  
Washington D.C. 20554

FCC-MALFORM

In the matter of )

Part 90 of the Commissions Rules to )  
Adopt Regulation for Automatic Vehicle )  
Monitoring Systems )

Pr Docket No. 93-61  
RM-8013

When the FCC approved the allocation of the 902MHz, 2.4 GHz, and 5.7 GHz bands in the 1980s, dozens of companies invested millions of dollars to develop leading-edge products for industrial and commercial use in these bands. Due to the difficulty in developing Spread Spectrum products, it took time to implement and bring these products to market. Today, the enormous investment of time and money has resulted in the birth of a new industry with reliable products available from many manufacturers.

Our company, Comtec Information Systems, Inc., has introduced 2 products since the adoption of this new technology and has sold 4,000 units to a customer base of approximately 5 users at locations across the United States. Attached please find literature describing our products. To ask our company to move current products and new development projects to another band or redesign specifications within the allocated bands affects not just our company, but also our customers.

Disruption within the 902 MHz band will send a clear signal to all customers and manufacturers that no investment in Spread Spectrum is safe from a rule change by the FCC. Investing in wireless technology will be adversely affected by any substantial rule change. End users, manufacturers and developers of the Part 15 technology are awaiting your ruling. Please deny the requested rule change and let our industry grow.

This industry has spawned new companies and new jobs with the potential for tremendous future growth. U.S. leadership in the wireless market promoted growth in both domestic and international markets. A change in the 902 - 928 MHz band could destroy all end user confidence in the wireless voice and data industry and would deal a blow to U.S. leadership in this area.

Your support in this matter would be greatly appreciated.

Sincerely,

Alfred J. Petteruti  
President, CEO

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